

May 28, 2002

EPA Region 5 Records Ctr.



362910

Via Electronic Mail

Mr. Dion Novak
Superfund Division
United States Environmental Protection Agency
77 West Jackson Boulevard
Mail Code: SR-6J
Chicago, Illinois 60604

Re: Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan
Eagle Zinc Company Site, Hillsboro, Illinois

Dear Mr. Novak:

This memorandum transmits proposed revisions to the Quality Assurance Project Plan (QAPP), which is contained in Appendix B of the draft RI/FW Work Plan (the "Work Plan") for the Eagle Zinc Company Site. The revisions are presented in "track changes" format. The USEPA's comments concerning the QAPP were forwarded to ENVIRON on May 17, 2002 in a memorandum prepared by USEPA's Field Services Section. The Agency's comments are repeated below in italics, followed by a response and a reference to the portion of the draft Work Plan that was modified in response to the comment.

1. *Group A: Project Management. The Approval Page and a list of acronyms/abbreviations are missing.*

These pages have been added to the QAPP.

2. *Group A: Project Management. The reference Attachment III-1C to the RI field sampling plan (FSP) was not found. Please include the field SOPs to the QAPP for the EPA review.*

As the QAPP contains cross-references to the FSP, a copy of the FSP will be provided to all users of the QAPP, as listed in Section A.1 of the QAPP. The Field SOPs are now referenced in Section A.5 of the QAPP and are included as Attachment B-1 to the QAPP.

3. *Group A: Project Management. Document Control Format (DCF) should be used to individually paginate each QAPP element to facilitate revisions as well as ensure that no pages are missing. The DCF is to be placed in the upper right-hand corner of each page and should include six elements: the project name; QAPP, FSP or Work Plan; revision number; a revision date; section number; page number.*

The document has been re-paginated in accordance to the prescribed DCF.

4. *Group A: Project Management. Please provide a table with the project required information action limits (use Table 1 of an Attachment A from the “Instructions on the preparation of a Superfund Division Quality Assurance Project Plan” as an example). Make sure that QAPP analytical requirements correspond with appropriate SOP information.*

Table B-4 of the QAPP has been expanded to include Reporting Limits (i.e., PQLs), Analytical Method MDLs, and Achievable Laboratory MDLs for all chemicals. Neither action limits nor project-specific ARARs have been established to date. As discussed during recent technical review meetings, ARARs will be assigned by USEPA during a later stage of the RI process. While action limits cannot be specified at this time, it is expected that all reporting limits will be below the actions limits, such that the chemical concentrations are accurately quantified.

5. *Section 4.c. Data Quality Objectives. The DQO process should be described in series of seven sequential steps to define the site specific problem, define the decision statement, identify the different types of information that will be needed to resolve the decision statement, define the boundaries of the study, develop a decision rule to integrate the output from previous step of the DQO process, specify limits on decision errors, identify the most resource effective sampling design that generates data. Please be more project specific in terms of the establishing acceptance criteria for the control limits associated with analytical methods. Do not describe the DQOs by analytical level. Follow the Instruction for Quality Objectives and Criteria for measurement Data (element 7, p15 of 68 from the “Instruction on the preparation of a Superfund Division Quality Assurance Project Plan”).*

Sections 4.c and 4.d have been deleted, as they are redundant. Section A.5 now includes a description of the seven-step DQO process.

6. *Group B: Data Generation and Acquisition. Please submit the acceptance criteria for each analyte parameter on separate pages for field and laboratory measurements (use Tables 4 and 5 from the Attachment A of the “Instruction” as an example).*

These tables (Tables B-3 and B-5, respectively) have been prepared in accordance with USEPA Region 5 guidance and are referenced in Section B.4.

7. *Group B: Data Generation and Acquisition. Please provide sample container, volume, preservation and holding time table. Table 7 of an Attachment A from the “Instruction” can be used as an example.*

This information is included in Table B-2, as referenced in Section B.2.b of the QAPP.

8. *Group B: Data Generation and Acquisition. All analytical SOPs should be written and formatted in accordance with Guidance for Preparation of Standard Operating Procedure for Quality-Related Documents (EPA QA/G6). In addition to the description of the procedure all SOPs must include the elements named in the "Instruction" p.39 of 68.*

Section B.5 of the QAPP has been modified to include the required information. Laboratory QC checks and corrective action measures are summarized in Attachment 3.

9. *Group B: Data Generation and Acquisition. EnChem laboratory should provide there specific Standard Operating Procedure for Mercury Analysis of Compositional and Aqueous Samples by CVAA.*

This SOP, which is contained in Attachment B-2 of the QAPP, is attached.

10. *Group C: Assessment/Oversight. Please address the numbers, frequency, type and documenting of internal and external assessments that will be perform for the project.*

The audits to be performed include Field Sampling Technical System Audits, Field Analytical Audits, and Data Validation and Management System Audits, as listed in Section C.1 of the QAPP. The documentation of the audits is discussed in Section C.2.

11. *Group C: Assessment/Oversight. Please specify the issues, which will be included in the Management Reports and Final Project Report.*

The Management Report will be a compilation of corrective action letters received during the project as described in Section C.2 of the QAPP. As also described in Section C.2, the QA evaluation will be included in a QA section of the Final RI Report. The final report is described in Section II.D of the RI/FS Work plan and is not further detailed in the QAPP.

Please do not hesitate to call me if you have any questions concerning these responses or the proposed revisions to the QAPP.

Sincerely,

ENVIRON International Corporation

F. Ross Jones, P.G.
Manager

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cc: Thomas Krueger, Esq. - USEPA Region 5
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